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CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
BY	Z DEPUTY

1 Van E. Flury
2 4009 W. Kiva Street
3 Laveen, Arizona 85339
4 (602) 237-9152, (602) 319-8777

5 Plaintiff, Pro Per

6 IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA

7 **CV '08 2098 PHX SRB**

8 VAN E. FLURY, an individual,

9 Plaintiff,

10 vs.

11 HEALTHCARE COLLECTIONS, INC., an
12 Arizona state corporation,

13 CHOICEPOINT, INC., a Georgia state
14 corporation;

15 Defendants.
16

CASE NO.

17 **COMPLAINT FOR VIOLATIONS
18 OF THE [FEDERAL] FAIR
19 CREDIT REPORTING ACT**

20 **JURISDICTION**

21 1) Plaintiff alleges the Court's jurisdiction of this matter pursuant to a Federal Question: the
22 cause of action against both defendants arising under the laws of the United States; i.e. *FCRA*,
23 *U.S.C. Title 15, section [1681] et seq.*

24 **COMPLAINT AGAINST DEFENDANT, HEALTHCARE COLLECTIONS, INC.**

25 2) Plaintiff alleges that the defendant, HealthCare Collections, Inc. [is not] a licensed
26 collection agency in the state of Arizona.

27 3) Plaintiff further alleges that the defendant, HealthCare Collections, Inc., is willfully and
28

1
2 knowingly, reporting [4] adverse collection accounts to the consumer credit files of the plaintiff,
3 Van E. Flury, specifically, TransUnion, Equifax, and Experian; from 4/26/2006, to present, even
4 though the defendant, HealthCare Collections, Inc., [is not] a licensed collection agency in the
5 state of Arizona.

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7 4) Plaintiff further alleges that the defendant, HealthCare Collections, Inc., has violated the
8 [FCRA], specifically, *U.S.C. Title 15, sec. 1681s-2, Responsibilities of furnishers of information*
9 *to the consumer reporting agencies*, [4] times against the plaintiff, Van E. Flury, by willfully and
10 knowingly, reporting the [4] adverse collection accounts to plaintiff's, TransUnion, Equifax, and
11 Experian credit files.

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13 5) Plaintiff further alleges that the adverse collection accounts are being specifically reported to
14 plaintiff's consumer credit files by the legal entity of: [**HealthCare Collections, Inc.**].

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17 **COMPLAINT AGAINST DEFENDANT, CHOICEPOINT, INC.**

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19 6) Plaintiff alleges that the defendant, CHOICEPOINT, INC., did knowingly obtain a copy of the
20 plaintiff's, Equifax Credit file on: September 17, 2008, without a permissible purpose pursuant to the
21 [FCRA] *U.S.C. Title 15, sec. 1681b, Permissible purposes of consumer reports*. Plaintiff further
22 alleges that this [hard] inquiry into the plaintiff's Equifax credit file by the defendant [was not] initiated
23 by the plaintiff, and the defendant, otherwise had no other permissible purpose for knowingly obtaining a
24 copy of plaintiff's Equifax Credit file.

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27 **PRAYER FOR RELIEF AND JUDGMENT**

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Complaint - Fair Credit Reporting Act.

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3 7) For their willful noncompliance, plaintiff prays for judgment against defendant, CHOICEPOINT,
4 INC., for the actual damages sustained by the plaintiff in the amount of: \$1,000.00, pursuant to: *U.S.C.*
5 *Title 15, section: 1681n (a)(1)(B)*, in their so obtaining a copy of plaintiff's Equifax Credit file without a
6 permissible purpose.

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8 8) Plaintiff prays for judgment against defendant, HEALTHCARE COLLECTIONS, INC., in
9 the amount of: \$4,000.00, as the actual damages sustained by plaintiff pursuant to: *U.S.C. Title 15,*
10 *section: 1681n (a)(1)(A)*, for their willfully failing to compile with the requirements imposed under:
11 *U.S.C. Title 15, sec. 1681s-2, Responsibilities of furnishers of information to the consumer*
12 *reporting agencies*, in their so reporting [4] adverse collection accounts to plaintiff's consumer
13 credit files when they are [not] licensed by the state of Arizona to do so. Plaintiff also prays for
14 injunctive relief in that the [4] adverse collection accounts be also removed from plaintiff's
15 respective credit files.

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17 9) Plaintiff prays for his taxable costs in bringing the lawsuit against both defendants.
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21 Dated this 13th day of November 2008.

22
23 By : 

24 Van E. Flury, plaintiff
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26 Laveen, Arizona 85339
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28

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